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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107-4431

July 1, 1996

Mr. Kin Y. Chung, Ph.D., P.E.  
American Geotech, Inc.  
1801 Penn Avenue  
Wyomissing Hills, Pennsylvania 19609

RE: Berks Landfill Superfund Site

Dear Mr. Chung:

I received your letter dated May 29, 1996 regarding comments and concerns about the Remedial Investigation at the Berks Landfill Site which you feel have been insufficiently addressed by EPA in the past. First, let me begin by stating that I was assigned as the Remedial Project Manager for the Berks Landfill Superfund Site as of April 26, 1996. I was assigned to the Site following the retirement of Mr. Anthony Koller. Following receipt of your May 29, 1996 letter, I reviewed the correspondence between yourself, Ms. Vivian Faust and EPA over the last several years. I also reviewed the March 26, 1996 letter addressed to you by Mr. Ronald Klinikowski, PADEP. Obviously my historical knowledge of the communication between the Concerned Citizens of Western Berks County ("CCWBC") and EPA is based solely on this correspondence. It is unfortunate that you continue to feel EPA is keeping the CCWBC "outside the project door" as stated in your letter. Please be assured that all of your questions, comments and concerns are taken seriously by EPA and are carefully considered. I believe that the past correspondence reflects that this has been the case and I can assure you that your comments and concerns will be considered as this project moves forward.

The revised Remedial Investigation Report for the Berks Landfill Site prepared by Golder Associates, Inc. was approved by Mr. Koller on March 29, 1996. A copy of the approved Remedial Investigation Report is enclosed. Obviously, you disagree with the interpretation of some of the data as presented in the Remedial Investigation Report. EPA staff scientists and the scientists of CH2M HILL, EPA's oversight contractor, have thoroughly reviewed this document. EPA believes that there is sufficient data available to finalize a Baseline Risk Assessment for the Site and to proceed with the Feasibility Study for the Site. The final revised Baseline Risk Assessment is due to be submitted to EPA by mid-summer. The initial draft of the Feasibility Study is to be submitted by late summer. The

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Feasibility Study will include an evaluation of possible remedial alternatives which could address the risks to human health and the environment posed by the Site.

The following paragraphs attempt to address your concerns raised in the May 29, 1996 letter. I realize that CCWBC and EPA may not always agree; however, I am committed to working cooperatively with CCWBC and anyone else with concerns regarding the Berks Landfill Site towards implementing a remedy at the Site in a timely and cost effective manner which protects human health and the environment.

In paragraph 2.A. of your May 29, 1996 letter you state the following concern; "Our concerns about the locations of replacement wells (more than 100 ft. From the decommissioned wells), the testing frequency of well contaminants, and the potential addition of more monitoring wells have not been fully addressed."

EPA believes it has sufficient groundwater data at present to develop the baseline risk assessment and to evaluate potential remedial alternatives in a Feasibility Study. EPA will consider the installation of additional monitoring wells as a component of possible alternatives during the feasibility study. Also, long term sampling frequency of all wells (monitoring and residential) will be considered during the remedy selection process. Additionally, EPA is preparing to collect a round of residential well samples from those residences which have been sampled in the past. The samples should be collected within the next several weeks and the results will be available for EPA to consider during the remedy selection process.

In paragraph 2.B. you state that "The presence of sinkholes may facilitate the flow of ground water contaminants to local wells through the solution channels, even if the sinkholes are above the aquitard. Also, sinkholes may effect the cap integrity." As stated above, local residential wells will be monitored to determine if contaminants from the Berks Landfill Site are affecting the residents water supply. Your comments concerning the integrity of the landfill cap are well taken. These comments will be taken under consideration during the feasibility study and selection of remedial alternatives.

Regarding paragraph 2.C. of your letter, EPA does not dispute that earthquakes could potentially affect the geology of the region as well as the localized Site geology. However, EPA believes there is sufficient geologic data available at present to develop the baseline risk assessment for the Site and to evaluate potential remedial alternatives in a feasibility study.

In paragraph 2.D. of your letter you raise concerns regarding the existence and condition of the disposed alkali sludge at the Site. I believe this is a reference to the area described in the Remedial Investigation as the Stabatrol sludge

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area. A discussion of the sampling conducted in the Stabatrol area can be found in Section 2.3.2 of the Remedial Investigation. The results of the sampling are discussed in Section 4.3 and are summarized in Table 4-10 of the report.

Concerning paragraph 2.E. of your letter, The map enclosed with your letter does appear to indicate that the lagoons are in the 100-year flood plain. However, as stated in Mr. Koller's letter to you of May 1, 1995, there is no law, or regulation prohibiting construction within the 100 year flood plain. Please see page 5. of Mr. Koller's May 1, 1995 letter for his full response regarding the on site leachate lagoons.

Regarding paragraph 2.F. of your May 29, 1996 letter, once again EPA believes there is sufficient geologic data available to move forward to develop the final baseline risk assessment and to evaluate potential remedial alternatives in a feasibility study.

In numbered paragraph 3 of your May 29, 1996 letter you requested copies of several documents. As stated above a complete copy of the EPA approved Remedial Investigation will be forwarded to you shortly. Golder & Associates, Inc. on behalf of the potentially responsible parties conducting the remedial investigation has agreed to provide this additional copy at no cost. A copy of the final Baseline Risk Assessment will be forwarded to you when it is available. Also, a copy of Golder's February 1995 Progress Report is enclosed. Finally, regarding your request for the Summary of the Remedial Investigation and Baseline Risk assessment results discussed in the April 22, 1996 meeting between Golder & Associates, Inc., EPA and representatives of the Berks Landfill PRP Group, you should be aware that no written summary was submitted by Golder to EPA at the April 22, 1996 meeting. The complete copy of the approved Remedial Investigation and Baseline Risk Assessment which will be sent to you shortly will include all the information which was discussed at the meeting.

Again, please be assured that EPA will consider all of your questions, comments and concerns and will attempt to provide you with information when it is available and appropriate as this project moves forward. A Proposed Remedial Action Plan ("PRAP") will be issued by EPA following finalization of the Feasibility Study discussed earlier. The PRAP will set forth EPA's preferred remedial alternative for the Site. The PRAP will be open for a 30 day public comment period. Following closing of the comment period EPA will consider and address all significant comments received during the comment period in a responsiveness summary. The Record of Decision for the Berks Site is currently planned to be completed in the winter of 1997.

In closing, I agree with your statement that a meeting among EPA, Golder and CCWBC to discuss the findings of the Remedial Investigation is appropriate and I will contact CCWBC shortly in this regard after you have had a chance to review the approved

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Remedial Investigation. Please feel free to call me with any additional questions, or concerns at (215) 566-3193.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charlie Root".

Charlie Root, Remedial Project Manager  
Eastern Pennsylvania Remedial Section

enclosure

cc: Ms. Vivian Faust, CCWBC  
Mr. Richard Morgan, PADEP  
John Ravert, County Environmentalist  
Anthony Dappolone, EPA

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